

FILED

MAR - 4 2020

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
V.)
)
DAVID LEROY SONTAG,)
)
Defendant.)

No. S1-4:19-CR-00455-RWS-1

SUPERSEDING INFORMATION

COUNT I

The United States Attorney charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

- (a) “minor” to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));
- (b) “sexually explicit conduct” to mean actual or simulated--
 - (i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A));

(c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6));

(d) “child pornography” to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. David Leroy Sontag previously pled guilty and was convicted on February 1, 1999, in St. Louis County, Missouri, of two felony counts of Forcible Sodomy.

4. On or about August 5, 2018, within the Eastern District of Missouri and elsewhere,

DAVID LEROY SONTAG,

the defendant herein, knowingly possessed images of child pornography that was produced using materials that traveled in interstate foreign commerce, to wit: a Kindle, said Kindle being produced outside Missouri and therefore having traveled in interstate and foreign commerce, and said Kindle contained child pornography, including, but not limited to, the following:

- a. “userdata(ExtX)/Root/media/0/Download/11(2).jpg,” a graphic image file that depicts, in part, a male engaged in sexual intercourse with a prepubescent minor female;
- b. “userdatea(ExtX)/Root/media/0/Download/17.jpg,” a graphic image file that depicts, in part, an infant minor female in a lascivious display of her genitals;
- c. “userdata(ExtX)/Root/media/0/Download/23(1).jpg,” a graphic image file that depicts, in part, an adult male in a lascivious display of his genitals while straddling an infant minor with the infant minor touching the male’s penis;
- d. “userdata(ExtX)/Root/media/0/Download/37(1).jpg,” a graphic image file that depicts, in part, a male engaged in sexual intercourse with a toddler minor female;
- e. “userdata(ExtX)/Root/media/0/Download/IwIbuoe_kindlephoto-132497451.jpg,” a graphic image file that depicts, in part, a male inserting his penis into the mouth of a prepubescent minor female;
- f. “userdata(ExtX)/Root/media/0/Download/og2yyoF_kindlephoto-132524574.jpg,” a graphic image file that depicts, in part, two males in a

lascivious display of their genitals, with their penises touching the face of a prepubescent minor female; and

- g. "userdata(ExtX)/Root/media/0/Download/WWbt0dd.jpg," a graphic image file that depicts, in part, a prepubescent minor female in a lascivious display of her genitals and an object inserted in her vagina.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B).

Respectfully submitted,

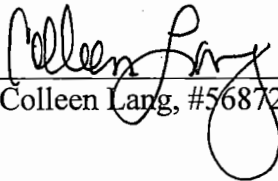
JEFFREY B. JENSEN
United States Attorney

USA *Colleen Long* *#56872UD*

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney

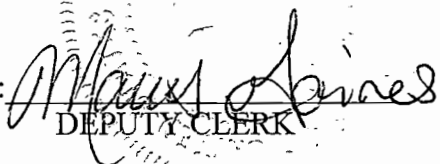
UNITED STATES OF AMERICA)
EASTERN DISTRICT OF MISSOURI)

I, Colleen Lang, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.


Colleen Lang, #56872MO

Subscribed and sworn before me this 4th day of March 2020.


CLERK, U.S. DISTRICT COURT

By: 
DEPUTY CLERK